

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

CAROLINE NYAMU,

PLAINTIFF

Index NO. 1677/2024

-against

LVNV FUNDING, LLC, AND

PORTFOLIO RECOVERY ASSOCIATES,

DEFENDANTS

COMPLAINT

TO THE SUPREME COURT OF THE STATE OF NEW YORK

1. CAROLINE NYAMU, hereinafter PLAINTIFF, a consumer, is a resident of the State of New York. Caroline Nyamu resides at 2080 Lafontaine Ave Apt 6K Bronx, NY 10457.
2. LVNV FUNDING, LLC (LVNV), AND PORTFOLIO RECOVERY ASSOCIATES (PRA), hereinafter DEFENDANTS, are debt collectors. LVNV is registered in New York State to do business and has a registered agent address at 80 STATE STREET, ALBANY, NY, UNITED STATES, 12207. Defendant is registered in New York State to do business and has a registered agent address at 80 STATE STREET, ALBANY, NY, UNITED STATES, 12207.
3. PLAINTIFF is a "consumer" as defined by the Fair Debt Collection Practices Act, hereinafter (FDCPA), because DEFENDANTS have alleged that PLAINTIFF owes unpaid financial obligations for personal credit card debt, satisfying subject matter jurisdiction under the FDCPA for the SUPREME COURT OF THE STATE OF NEW YORK to make PLAINTIFF whole again with lawful remedy.
4. PLAINTIFF has Article III standing because of the emotional-physical distress, monetary harm, wasted time, and reputational distress from concrete injuries sustained by DEFENDANTS unlawful negligent, and willful actions.
5. DEFENDANTS are "debt collector(s)" as defined by the FDCPA because DEFENDANTS are engaged in the business of buying and collecting debts owed to its clients and, as such, regularly collects or attempts to collect debts owed or due or asserted to be owed or due to another. DEFENDANTS are engaged in the business of buying and collecting debt as their principal purpose of business. DEFENDANTS are well known in the debt collection industry and are in various lawsuits as defendants in FDCPA, as debt collectors.

24 APR - 1 PM 3:00
COUNTY CLERK
BRONX COUNTY

RECEIVED

6. PLAINTIFF reached out to a close friend, Bobby L. Hughley Jr., who is very familiar with the FDCPA and New York State Consumer Laws. PLAINTIFF explained the situation to Bobby and authorized him to remedy the situation by sending correspondence to DEFENDANTS on PLAINTIFFS behalf. PLAINTIFF continues to get the help needed from Bobby L. Hughley Jr. concerning this issue with DEFENDANTS until the issue no longer exists.
7. PLAINTIFF discovered a collection account furnished to the consumer report and authorized Bobby L. Hughley Jr. to mail a written communication to DEFENDANT, on PLAINTIFF'S behalf, to cease all communication and refuse to pay on or around February 23, 2023. The written communications were addressed to LVNV FUNDING, LLC c/o RESURGENT CAPITAL SERVICES, LP and PORTFOLIO RECOVERY ASSOCIATES, pursuant to 15 USC § 1692C(c).
8. On February 27, 2023, DEFENDANTS each received the written notice pursuant to 15 USC § 1692C(c). For Defendant, LVNV the delivery was confirmed via USPS certified mail tracking # 7021-0350-0002-3197-1395 and USPS Domestic mail return receipt. For Defendant, PRA, the delivery was confirmed via USPS certified mail tracking # 7021-0350-0002-3197-1401 and USPS Domestic mail return receipt. Pursuant to 15 USC § 1692C(c) after receiving PLAINTIFF'S written communication DEFENDANTS actions are barred by statute if the actions are not within the ambit of the law once written communication to cease all communication and refusal to pay is received by mail, see exhibit
9. DEFENDANT, LVNV consistently and willfully indirectly communicated with the Plaintiff, a consumer, after receipt of PLAINTIFF'S written communication letter from March 2023-Present day 2024, by indirectly communicating the alleged debt to the consumer reporting agencies. DEFENDANT, PRA consistently and willfully indirectly communicated with the Plaintiff, a consumer, after receipt of PLAINTIFF'S written communication letter from March 2023-Present day 2024, by indirectly communicating the alleged debt to the consumer reporting agencies, see exhibits.
10. Upon receipt of the notice DEFENDANTS were bound by 15 USC § 1692C(c) to cease all communication in connection with debt collection, including third party communication. DEFENDANTS violated the statute, continuously and willfully ignoring statutory procedure each month for over a year. By repeatedly indirectly communicating with the consumer in connection with debt collection to the consumer credit report for Transunion, Equifax, and Experian, hereinafter "Consumer Reporting Agencies" the DEFENDANTS were in violation of the FDCPA.
11. DEFENDANTS indirect communication with the consumer report vicariously extended to other creditors already engaged in a consumer creditor agreement with the PLAINTIFF and future creditors looking to qualify PLAINTIFF for the extension of consumer credit.

12. The actions by DEFENDANTS created concrete injuries when the indirect communication negatively impacted the PLAINTIFF. PLAINTIFF was denied the extension of consumer credit by Chase Bank on October 18, 2023, and by Capital One Bank on February 8, 2024, because of the continued indirect communication with the PLAINTIFF from DEFENDANTS to the CRA's. The credit reputation of PLAINTIFF was destroyed and access to any credit was unobtainable because of the DEFENDANTS unlawful consistent indirect communication with PLAINTIFF. Prior to any attempts to obtain credit PLAINTIFF waited for DEFENDANTS to remove the communication from the consumer report in hopes that DEFENDANTS would comply with the statute.

COUNT 1

13. DEFENDANTS, LVNV and PRA are in violation of 15 USC § 1692C(c) for the following reason(s): PLAINTIFF sent a written communication to both DEFENDANTS pursuant to 15 USC § 1692C(c). The FDCPA communication stated that the PLAINTIFF wanted the DEFENDANTS to cease communication and that the PLAINTIFF refused to pay. The DEFENDANTS received the written communication and did not comply with the procedures provided by statute after receiving the written communication. Therefore, the DEFENDANTS were well aware of the violation and willfully continued to indirectly communicate with the CRA's about the debt. Upon receipt of the notice DEFENDANTS were bound by statutory procedure, 15 USC § 1692C(b) to cease all communication, including any third parties.

COUNT II

14. DEFENDANTS, LVNV and PRA are in violation of 15 USC § 1692C(b) for the following reason(s): The DEFENDANTS received a written communication from PLAINTIFF and were not permitted to communicate to the credit reporting agencies, third parties not permitted by law. DEFENDANTS communication subsequently resulted in the denial of the PLAINTIFF being extended credit from persons acting as creditors, through the vicarious communication to the CRA'S. DEFENDANTS actions were not in the ambit of the FDCPA and were barred, creating violations of the FDCPA when communication restrictions were breached. PLAINTIFF removed any presumed consent to communicate with the CRA'S when PLAINTIFF sent the written communication, and the communication was received.

COUNT III

15. DEFENDANTS LVNV and PRA are in violation of 15 USC § 1692D(3) for the following reason(s): DEFENDANTS placed PLAINTIFF on a list of consumers who **allegedly** refused to pay and consistently communicating that list to the CRA'S, after DEFENDANT was in receipt of DEFENDANTS written communication to cease communication and refusal to pay. PLAINTIFF'S written communication informed DEFENDANTS of PLAINTIFF'S refusal to pay and upon receipt of the written there was nothing alleged about PLAINTIFF'S refusal. Due to the fact that PLAINTIFF'S refusal wasn't alleged DEFENDANTS violated 15 USC § 1692D(3) by placing PLAINTIFF on a list of consumers who **allegedly** refused to pay. The communication actions of the DEFENDANTS are consistent with a harassing, oppressive, and abusive approach in connection with the collection of a debt against the PLAINTIFF, a consumer, being that the unlawful and willful communication was consistent.

COUNT IV

16. DEFENDANTS LVNV and PRA are in violation 15 USC § 1692E for the following reason(s): DEFENDANTS unlawfully were communicating in connection with debt collection making it appear that PLAINTIFF owed money for an alleged debt after written notice to cease all communication and refusal to pay was received by mail. DEFENDANTS were not allowed to communicate after receiving PLAINTIFF'S written communication to cease communication and refusal to pay. The consistent unlawful actions of the DEFENDANTS gave a false, deceptive, and misleading representation because the continued communication was an attempt to collect the alleged debt without the right or consent to communicate, violating the law. The unlawful communication created the presumption that the DEFENDANTS were well within the right to keep communicating and that PLAINTIFF in fact owed a debt and led to PLAINTIFF being denied credit.

COUNT V

17. DEFENDANTS LVNV and PRA are in violation 15 USC § 1692F for the following reason(s): DEFENDANTS were aggressively being consistent in the unlawful communication in connection with debt collection, after receiving PLAINTIFF, without right, consent, and being permitted by law, after the written notice to cease all communication and refusal to pay was received by mail, clearly violating 15 USC § 1692C(c), 15 USC § 1692C(b), 15 USC § 1692D(3), and 15 USC § 1692E, subsequently violating 15 USC § 1692F. The continued violations can be viewed as unfair practices toward the PLAINTIFF. These violations are unfair practice for a debt collector to attempt to collect an alleged debt through coercion. DEFENDANTS engaged in unfair debt collection practices by ignoring the statutory procedure of the Fair Debt Collections Practices Act. DEFENDANTS have been in the debt collection business for several years and should by now know what the difference between fair and unfair practices is and how unfair practices can bring harm upon the consumer.

COUNT VI

18. DEFENDANTS are in violation of the New York General Business Law – GBS Article 22-A § 349 for the following reason(s): PLAINTIFF asserts that the matter at hand is consumer oriented. DEFENDANTS conduct engaged in unlawful communication with PLAINTIFF by indirectly communicating with PLAINTIFF via reporting on PLAINTIFF'S consumer credit report. The communication by the DEFENDANTS is materially misleading as it creates a false representation and PLAINTIFF has suffered actual damages by being denied access to credit because of DEFENDANTS'S unlawful communications that created a negative impact on PLAINTIFF'S credit worthiness and reputation, see attach exhibits.

COUNT VII

19. DEFENDANTS are in violation of PROFESSIONAL MALPRACTICE for the following reason(s): DEFENDANTS failed to exercise an ordinary degree of professional skill resulting in the injury to PLAINTIFF. DEFENDANTS were negligent in following statutory procedure which was the cause of PLAINTIFF sustaining injuries by suffering emotional distress leading to physical manifestations of chest tightness, brief periods of hyperventilation, migraines from thinking about the situation, tremors, accelerated heartbeat, vertigo, loss of appetite, loss of sleep, embarrassment from having to tell others and seek help to resolve the current financial situation, depression, and being denied credit. DEFENDANTS actions were negligent because of the failure to exercise a degree of care that a reasonably prudent person would have exercised under the same circumstances. DEFENDANTS committed professional malpractice because of the dereliction of professional duty or a failure to exercise an ordinary degree of professional skill resulting in several concrete injuries sustained by PLAINTIFF.

CONCRETE INJURIES

20. PLAINTIFF was denied credit and as a result PLAINTIFF suffered concrete injuries of intentional infliction of emotional-physical distress because of the DEFENDANTS actions. PLAINTIFF developed mental anxiety that has led to physical manifestations of chest tightness, brief periods of hyperventilation, migraines from thinking about the situation, tremors, accelerated heartbeat, vertigo, loss of appetite, loss of sleep, embarrassment from having to tell others and seek help to resolve the current financial situation, depression, and being denied credit. DEFENDANTS willfully and intentionally caused PLAINTIFF to suffer emotional damage, creating a rough emotional environment for PLAINTIFF. see exhibits.

21. PLAINTIFF has suffered concrete injuries of monetary, reputational, and wasted time damages because of the DEFENDANTS actions. PLAINTIFF was denied credit and seen as an unworthy consumer to lend to by Chase Bank and Capital One Bank on two separate occasions in the year 2023 and 2024. PLAINTIFF'S time was wasted by waiting for DEFENDANTS to follow statutory procedure. The statutory procedure of the FDCPA and the Laws of the STATE OF NEW YORK were consistently violated over a lengthy period of time. The time lost is great because of the duration of the DEFENDANTS consistent unlawful actions, this is time that PLAINTIFF can't get back and unable to gain a financial edge on life. PLAINTIFF was more than patiently waiting for DEFENDANTS to stop communication, but DEFENDANTS kept reestablishing communication against PLAINTIFF'S and against the law.
22. PLAINTIFF is requesting a substantial punitive damages award from the court to further punish DEFENDANTS for their willful actions.
23. PLAINTIFF demands a Trial by Jury in this matter.

PRAYER OF RELIEF

24. I wish the court to award the maximum award for statutory damages from the DEFENDANTS'S violation of the FDCPA.
25. I wish the court to award the maximum award, treble, for statutory damages from the DEFENDANTS'S violation of the LAWS OF THE STATE OF NEW YORK.
26. I wish the court to award the amount of \$5,000,000.00 for ACTUAL OR COMPENSATORY damages.
27. I wish the court to award the amount of \$500,000.00 NEGLIGENCE and NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS damages.
28. I wish the court to award the maximum monetary award for PROFESSIONAL MALPRACTICE damages.
29. I wish the court to award the maximum monetary award for PUNITIVE damages.
30. I wish the court to award injunctive relief to stop the DEFENDANTS from communicating and to remove the alleged debt from the consumer profile.

Under penalty of perjury, I hereby declare and affirm that the above-mentioned statement is, to the best of my knowledge, true and correct.

~~Witness~~ Signature: Caroline Nyamu Date: 3/29/24

NOTARY ACKNOWLEDGEMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, and not the truthfulness, accuracy, or validity of that document.

State of New York

County of New York

On MARCH 29, 2024, before me, CAROLINE NYAMU, personally appeared who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under the PENALTY OF PERJURY under the laws of the State of NEW YORK that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature

Joseph K. Eady

JOSEPH K. EADY
Commissioner of Deeds
City of New York No. 3-3593
Certificate Filed in Bronx County
Commission Expires Nov. 1, 2024

TABLE OF CONTENTS TO EXHIBITS

ATTACHED AS EXHIBITS ARE COPIES OF ALL RELEVANT DOCUMENTS

Exhibit A – Caroline Nyamu’s notice of cease and desist and refusal to pay letter dated February 22, 2023.

Exhibit B – Caroline Nyamu’s USPS proof of mailing, proof of receipt, and USPS website tracking information for notice of cease and desist and refusal to pay letter.

Exhibit C – Caroline Nyamu’s Experian credit report showing communication, reports generated on March 29, 2024.

Exhibit D – Caroline Nyamu’s Equifax credit report showing communication, reports generated on March 29, 2024.

Exhibit E – Caroline Nyamu’s Transunion credit report showing communication, reports generated on March 29, 2024.

Exhibit F – Caroline Nyamu’s denial of credit by Chase Bank dated October 18, 2023.

Exhibit G – Caroline Nyamu’s denial of credit by Capital One Bank dated February 08, 2024.

Exhibit H – Affidavit of Bobby L. Hughley Jr.

24 APR - 1 PM 3:00
COUNTY CLERK
BRONX COUNTY

RECEIVED

Exhibit I – Affidavit of Caroline Nyamu

EXHIBIT A

Date: 2/22/2023

CERTIFIED MAIL # 7021-0350-0002-3197-1395

CAROLINE NYAMU
2080 Lafontaine Ave
Apt 6K
Bronx, NY 10457

LVNV Funding, LLC
c/o Resurgent Capital Services, LP
P.O. Box 10497
Greenville, SC 29603

RE: Notice of Cease and Desist and refusal to pay

Dear, LVNV Funding LLC

This is to notify you that I hereby refuse to pay and wish that LVNV Funding LLC cease further communication with me, the consumer. The term "communication" means the conveying of information regarding a debt directly or indirectly to any person through any medium; this includes the existing communication to my consumer report. I also remind LVNV Funding LLC to remove any communication to the consumer reporting agencies about the alleged debt of \$1,003.00 to avoid further violations, as that communication is indirect communication in connection with a collection of a debt. I expect, in accordance with the law, the communication to cease upon receipt of this notice, and no further communication after receipt. Please mail by check any return payments to the above address.

Thank you for your prompt attention to this matter.

Sincerely,

Caroline Nyamu

Date: 2/22/2023

CERTIFIED MAIL # 7021-0350-0002-3197-1401

CAROLINE NYAMU
2080 Lafontaine Ave
Apt 6K
Bronx, NY 10457

PORTFOLIO RECOVERY ASSOCIATES
120 CORPORATE BLVD
Norfolk, VA 23502

RE: Notice of Cease and Desist and refusal to pay

Dear, Portfolio Recovery Associates

This is to notify you that I hereby refuse to pay and wish that Portfolio Recovery Associates cease further communication with me, the consumer. The term "communication" means the conveying of information regarding a debt directly or indirectly to any person through any medium; this includes the existing communication to my consumer report. I also remind Portfolio Recovery Associates to remove any communication to the consumer reporting agencies about the two alleged debts of \$1,240.00 and \$1,385.00 to avoid further violations, as those communications are indirect communications in connection with a collection of a debt. I expect, in accordance with the law, the communication to cease upon receipt of this notice, and no further communication after receipt. Please mail by check any return payments to the above address.

Thank you for your prompt attention to this matter.

Sincerely,

Caroline Nyamu

EXHIBIT B

7021 0350 0002 3197 1401

U.S. Postal Service™ *Case Court-2P*
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only *Charlotte Nymore*

For delivery information, visit our website at www.usps.com®.

Not for OFFICIAL USE

Certified Mail Fee	\$4.15
Postage	\$0.63
Total Postage and Fees	\$8.13

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Sent To
Artelia Recovery Associates
 Street and Apt. No., or PO Box No.
120 Corporate Blvd
 City, State, ZIP+4®
Norfolk, VA 23502

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Postmark Here
 02/23/2023

7021 0350 0002 3197 1395

U.S. Postal Service™ *Case Court-2P*
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only *Charlotte Nymore*

For delivery information, visit our website at www.usps.com®.

Not for OFFICIAL USE

Certified Mail Fee	\$4.15
Postage	\$0.63
Total Postage and Fees	\$8.13

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Sent To
Lyndi Finney LLC / c/o Resurgent Capital Services
 Street and Apt. No., or PO Box No.
P.O. Box 10497
 City, State, ZIP+4®
Greenville, SC 29603

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Postmark Here
 02/23/2023

Tracking Number:

70210350000231971395

Remove X

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item has been delivered to an agent for final delivery in GREENVILLE, SC 29601 on February 27, 2023 at 5:23 am.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered to Agent

Delivered to Agent for Final Delivery

GREENVILLE, SC 29601

February 27, 2023, 5:23 am

Arrived at Post Office

GREENVILLE, SC 29601

February 27, 2023, 5:20 am

In Transit to Next Facility

February 26, 2023

Arrived at USPS Regional Destination Facility

GREENVILLE SC DISTRIBUTION CENTER

February 25, 2023, 12:04 pm

Arrived at USPS Regional Origin Facility

NEW YORK NY DISTRIBUTION CENTER

February 23, 2023, 8:49 pm

USPS in possession of item

Feedback

USPS Tracking®

[FAQs >](#)

Tracking Number:

[Remove X](#)**70210350000231971401**[Copy](#)[Add to Informed Delivery \(https://informedelivery.usps.com/\)](https://informedelivery.usps.com/)

Latest Update

Your item was picked up at a postal facility at 10:58 am on February 27, 2023 in NORFOLK, VA 23502.

Get More Out of USPS Tracking:**USPS Tracking Plus®**

Feedback

Delivered

Delivered, Individual Picked Up at Postal Facility

NORFOLK, VA 23502

February 27, 2023, 10:58 am

Out for Delivery

NORFOLK, VA 23502

February 27, 2023, 9:10 am

Arrived at Post Office

NORFOLK, VA 23502

February 27, 2023, 8:59 am

Arrived at USPS Regional Destination Facility

NORFOLK VA DISTRIBUTION CENTER

February 25, 2023, 10:56 am

In Transit to Next Facility




February 24, 2023




Arrived at USPS Regional Origin Facility

NEW YORK NY DISTRIBUTION CENTER

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) _____</p> <p>C. Date of Delivery _____</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>1. Article Addressed to:</p> <p><i>Portfolio Recovery Associates</i> <i>120 Corporate Blvd</i> <i>Norfolk, VA 23502</i></p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>	
<p>2. Article Number (Transfer from service label)</p> <p>021 0350 0002 3197 1401</p>		<p>Domestic Return Receipt</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>			

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) _____</p> <p>C. Date of Delivery _____</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>1. Article Addressed to:</p> <p><i>LUNV Funding LLC</i> <i>C/O Resurgent Capital Services LP</i> <i>P.O. Box 10497</i> <i>Greenville, SC 29603</i></p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7021 0350 0002 3197 1395</p>		<p>Domestic Return Receipt</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>			

USPS TRACKING #			<div>First-Class Mail Postage & Fees Paid USPS Permit No. G-10</div>
	RICHMOND, VA 230		
9590 9402 7096 1251 2641 77			
United States Postal Service	• Sender: Please print your name, address, and ZIP+4® in this box•		
	<p>Caroline NYAMU 2080 LaFontaine Ave Apt 6K Bronx, NY 10457</p>		
			

USPS TRACKING #			<div>First-Class Mail Postage & Fees Paid USPS Permit No. G-10</div>
	GREENVILLE, SC 296		
9590 9402 7096 1251 2641 84			
United States Postal Service	• Sender: Please print your name, address, and ZIP+4® in this box•		
	<p>Caroline NYAMU 2080 LaFontaine Ave Apt 6K Bronx, NY 10457</p>		
			

7-332081

EXHIBIT C

3/29/24, 11:58 AM

Annual Credit Report - Experian

Prepared For

CAROLINE NYAMU**Personal & Confidential****Date Generated** Mar 29, 2024**Report Number** 1063-3023-29

At a Glance **11 Accounts** **0 Public Records** **7 Hard Inquiries**

Personal Information

3 Names**7** Addresses**1** Employers**3** Other Records

Because your personal information is reported by you, your creditors, and other sources, it's typical to see small variations in reported personal information, like names and addresses. For security reasons, many of these items can't be disputed online, but don't worry—they don't affect your credit score.

Names

CAROLINE NYAMU

Name ID #18931

CAROLINE W NYAMU

Name ID #18325

**CAROLINE WANGECI
NYAMU**

Name ID #8632

3/29/24, 11:58 AM

Annual Credit Report - Experian

Date	Balance	Scheduled Payment	Paid
Jun 2022	\$225	\$29	\$29 on 10/5/2021
May 2022	\$225	\$29	\$29 on 10/5/2021
Apr 2022	\$225	\$29	\$29 on 10/5/2021
Mar 2022	\$225	\$29	\$29 on 10/5/2021

Additional info

Between Mar 2022 and Feb 2024, your credit limit/high balance was \$5,000

**Contact Info**

Address

3911 N SCHREIBER WAY,
COEUR D ALENE ID 83815

Phone Number

(800) 654-6310

PORTFOLIO RECOVERY ASSOCIATES

POTENTIALLY NEGATIVE

**Account Info**

Account Name

PORTFOLIO RECOVERY ASSOCIATES

Account Number

524366XXXXXXXXXX

Account Type

Debt Buyer

Responsibility

Individual

Date Opened

08/20/2022

Status

Collection account. \$1,240 past due as of Mar 2024.

Status Updated

Aug 2022

Balance

\$1,240

Balance Updated

03/09/2024

Recent Payment

-

Monthly Payment

-

Original Balance

\$1,240

Highest Balance

-

Terms

1 Months

On Record Until

Oct 2028

**Payment History**

3/29/24, 11:58 AM

Annual Credit Report - Experian

	J	F	M	A	M	J	J	A	S	O	N	D
2024	C	C	C	—	—	—	—	—	—	—	—	—
2023	C	C	C	C	C	C	C	C	C	C	C	C
2022	—	—	—	—	—	—	—	—	—	—	—	C

C Collection

Payment history guide

Collection as of Jan 2024 to Mar 2024, Dec 2023, Dec 2023, Nov 2023, Oct 2023, Sep 2023, Sep 2023, Aug 2023, Jul 2023, Jun 2023, Jun 2023, May 2023, Apr 2023, Mar 2023, Mar 2023, Feb 2023, Jan 2023, Dec 2022, Dec 2022

This account is scheduled to continue on record until Oct 2028.

**Balance Histories**

Date	Balance	Scheduled Payment	Paid
Feb 2024	\$1,240	\$0	\$0
Jan 2024	\$1,240	\$0	\$0
Dec 2023	\$1,240	\$0	\$0
Nov 2023	\$1,240	\$0	\$0
Oct 2023	\$1,240	\$0	\$0
Sep 2023	\$1,240	\$0	\$0
Aug 2023	\$1,240	\$0	\$0
Jul 2023	\$1,240	\$0	\$0
Jun 2023	\$1,240	\$0	\$0
May 2023	\$1,240	\$0	\$0
Apr 2023	\$1,240	\$0	\$0
Mar 2023	\$1,240	\$0	\$0
Feb 2023	\$1,240	\$0	\$0
Jan 2023	\$1,240	\$0	\$0
Dec 2022	\$1,240	\$0	\$0
Dec 2022	\$1,240	\$0	\$0

3/29/24, 11:58 AM

Annual Credit Report - Experian

Additional info

The original amount of this account was \$1,240

**Historical Info**

Original Creditor

SYNCHRONY BANK

**Contact Info**

Address

120 CORPORATE BLVD STE 100,
NORFOLK VA 23502

Phone Number

(844) 675-3408**PORTFOLIO RECOVERY ASSOCIATES****POTENTIALLY NEGATIVE****Account Info**

Account Name

PORTFOLIO RECOVERY ASSOCIATES

Account Number

604419XXXXXXXXXX

Account Type

Debt Buyer

Responsibility

Individual

Date Opened

09/17/2022

Status

Collection account. \$1,385 past due as of Mar 2024.

Status Updated

Sep 2022

Balance

\$1,385

Balance Updated

03/13/2024

Recent Payment

-

Monthly Payment

-

Original Balance

\$1,385

Highest Balance

-

Terms

1 Months

On Record Until

Nov 2028

**Payment History**

	J	F	M	A	M	J	J	A	S	O	N	D
2024	C	C	C	—	—	—	—	—	—	—	—	—
2023	C	C	C	C	C	C	C	C	C	C	C	C

3/29/24, 11:58 AM

Annual Credit Report - Experian

C Collection

Payment history guide

Collection as of Mar 2024, Feb 2024, Jan 2024, Jan 2024, Dec 2023, Nov 2023, Oct 2023, Oct 2023, Sep 2023, Aug 2023, Jul 2023, Jul 2023, Jun 2023, May 2023, Apr 2023, Apr 2023, Mar 2023, Feb 2023, Jan 2023, Jan 2023

This account is scheduled to continue on record until Nov 2028.

**Balance Histories**

Date	Balance	Scheduled Payment	Paid
Feb 2024	\$1,385	\$0	\$0
Jan 2024	\$1,385	\$0	\$0
Dec 2023	\$1,385	\$0	\$0
Nov 2023	\$1,385	\$0	\$0
Oct 2023	\$1,385	\$0	\$0
Sep 2023	\$1,385	\$0	\$0
Aug 2023	\$1,385	\$0	\$0
Jul 2023	\$1,385	\$0	\$0
Jun 2023	\$1,385	\$0	\$0
May 2023	\$1,385	\$0	\$0
Apr 2023	\$1,385	\$0	\$0
Mar 2023	\$1,385	\$0	\$0
Feb 2023	\$1,385	\$0	\$0
Jan 2023	\$1,385	\$0	\$0
Jan 2023	\$1,385	\$0	\$0

Additional info

The original amount of this account was \$1,385

**Historical Info**

Original Creditor

SYNCHRONY BANK

3/29/24, 11:58 AM

Annual Credit Report - Experian

**Contact Info**

Address

120 CORPORATE BLVD STE 100,
NORFOLK VA 23502

Phone Number

(844) 675-3408**RESURGENT/LVNV FUNDING**

POTENTIALLY NEGATIVE

**Account Info**

Account Name

RESURGENT/LVNV FUNDING

Account Number

379364XXXXXXXXXX

Account Type

Debt Buyer

Responsibility

Individual

Date Opened

12/16/2022

Status

Collection account. \$1,003 past due as of Mar 2024.

Status Updated

Dec 2022

Balance

\$1,003

Balance Updated

03/05/2024

Recent Payment

-

Monthly Payment

-

Original Balance

\$1,003

Highest Balance

-

Terms

1 Months

On Record Until

Feb 2029

**Payment History**

	J	F	M	A	M	J	J	A	S	O	N	D
2024	C	C	C	—	—	—	—	—	—	—	—	—
2023	—	C	C	C	C	C	C	C	C	C	C	C

C Collection

Payment history guide

Collection as of Feb 2023 to Mar 2024

This account is scheduled to continue on record until Feb 2029.

3/29/24, 11:58 AM

Annual Credit Report - Experian

**Balance Histories**

Date	Balance	Scheduled Payment	Paid
Feb 2024	\$1,003	\$0	\$0
Jan 2024	\$1,003	\$0	\$0
Dec 2023	\$1,003	\$0	\$0
Nov 2023	\$1,003	\$0	\$0
Oct 2023	\$1,003	\$0	\$0
Sep 2023	\$1,003	\$0	\$0
Aug 2023	\$1,003	\$0	\$0
Jul 2023	\$1,003	\$0	\$0
Jun 2023	\$1,003	\$0	\$0
May 2023	\$1,003	\$0	\$0
Apr 2023	\$1,003	\$0	\$0
Mar 2023	\$1,003	\$0	\$0
Feb 2023	\$1,003	\$0	\$0

Additional info

The original amount of this account was \$1,003

**Historical Info**

Original Creditor CREDIT ONE BANK N.A.

**Contact Info**

Address

PO BOX 1269,
GREENVILLE SC 29602

Phone Number

(866) 464-1183

**Comment****Current:**

Account information disputed by consumer (Meets requirement of the Fair Credit Reporting Act).

EXHIBIT D



CREDIT REPORT

CAROLINE NYAMU

Report Confirmation

4589349379

5. Other Accounts

Other accounts are those that are not already identified as Revolving, Mortgage or Installment Accounts such as child support obligations or rental agreements.

5.1 PORTFOLIO RECOVERY ASSOCIATES (CLOSED)

Summary

Your debt-to-credit ratio represents the amount of credit you're using and generally makes up a percentage of your credit score. It's calculated by dividing an account's reported balance by its credit limit.

Account Number	xxxxxxxxxxxxxxxx 6984	Reported Balance	\$1,385
Account Status	COLLECTION	Available Credit	

Account History

The tables below show up to 3 years of the monthly balance, available credit, scheduled payment, date of last payment, high credit, credit limit, amount past due, activity designator, and comments.

Balance

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Available Credit

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Scheduled Payment

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Actual Payment

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

High Credit

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Credit Limit

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Amount Past Due

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Activity Designator

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Payment History

You currently do not have any Payment History in your file.

Account Details

View detailed information about this account. Contact the creditor or lender if you have any questions about it.

High Credit	\$1,385	Owner	INDIVIDUAL
Credit Limit		Account Type	OTHER
Terms Frequency	UNKNOWN	Term Duration	0
Balance	\$1,385	Date Opened	Sep 17, 2022
Amount Past Due	\$1,385	Date Reported	Mar 13, 2024
Actual Payment Amount		Date of Last Payment	
Date of Last Activity		Scheduled Payment Amount	
Months Reviewed	14	Delinquency First Reported	Jan 2023
Activity Designator		Creditor Classification	BANKING
Deferred Payment Start Date		Charge Off Amount	
Balloon Payment Date		Balloon Payment Amount	
Loan Type	Debt Buyer Account	Date Closed	
Date of First Delinquency	Feb 2022		

Comments

Collection account

Contact

PORTFOLIO RECOVERY ASSOCIATES
120 CORPORATE BLVD, STE 100
NORFOLK, VA 23502
1-757-519-9300

5.3 PORTFOLIO RECOVERY ASSOCIATES (CLOSED)**Summary**

Your debt-to-credit ratio represents the amount of credit you're using and generally makes up a percentage of your credit score. It's calculated by dividing an account's reported balance by its credit limit.

Account Number	xxxxxxxxxxxxxxxx 1393	Reported Balance	\$1,240
Account Status	COLLECTION	Available Credit	

Account History

The tables below show up to 3 years of the monthly balance, available credit, scheduled payment, date of last payment, high credit, credit limit, amount past due, activity designator, and comments.

Balance

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Available Credit

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Scheduled Payment

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Actual Payment

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												

2023

2024

High Credit

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
------	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----

2022

2023

2024

Credit Limit

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
------	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----

2022

2023

2024

Amount Past Due

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
------	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----

2022

2023

2024

Activity Designator

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
------	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----

2022

2023

2024

Payment History

You currently do not have any Payment History in your file.

Account Details

View detailed information about this account. Contact the creditor or lender if you have any questions about it.

High Credit**\$1,240****Owner****INDIVIDUAL**

Credit Limit		Account Type	OTHER
Terms Frequency	UNKNOWN	Term Duration	0
Balance	\$1,240	Date Opened	Aug 20, 2022
Amount Past Due	\$1,240	Date Reported	Mar 09, 2024
Actual Payment Amount		Date of Last Payment	
Date of Last Activity		Scheduled Payment Amount	
Months Reviewed	15	Delinquency First Reported	Dec 2022
Activity Designator		Creditor Classification	BANKING
Deferred Payment Start Date		Charge Off Amount	
Balloon Payment Date		Balloon Payment Amount	
Loan Type	Debt Buyer Account	Date Closed	
Date of First Delinquency	Jan 2022		
Comments		Contact	
Collection account		PORTFOLIO RECOVERY ASSOCIATES 120 CORPORATE BLVD, STE 100 NORFOLK, VA 23502 1-757-519-9300	

5.4 LVNV FUNDING LLC (CLOSED)**Summary**

Your debt-to-credit ratio represents the amount of credit you're using and generally makes up a percentage of your credit score. It's calculated by dividing an account's reported balance by its credit limit.

Account Number	xxxxxxxxxx 3325	Reported Balance	\$1,003
Account Status	COLLECTION	Available Credit	

Account History

The tables below show up to 3 years of the monthly balance, available credit, scheduled payment, date of last payment, high credit, credit limit, amount past due, activity designator, and comments.

Balance

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Available Credit

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Scheduled Payment

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
2023												
2024												

Actual Payment

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												

2023

2024

High Credit

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
------	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----

2022

2023

2024

Credit Limit

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
------	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----

2022

2023

2024

Amount Past Due

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
------	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----

2022

2023

2024

Activity Designator

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
------	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----

2022

2023

2024

Payment History

You currently do not have any Payment History in your file.

Account Details

View detailed information about this account. Contact the creditor or lender if you have any questions about it.

High Credit

\$1,003

Owner**INDIVIDUAL**

Credit Limit		Account Type	OTHER
Terms Frequency	UNKNOWN	Term Duration	0
Balance	\$1,003	Date Opened	Dec 16, 2022
Amount Past Due	\$1,003	Date Reported	Mar 05, 2024
Actual Payment Amount		Date of Last Payment	
Date of Last Activity		Scheduled Payment Amount	
Months Reviewed	13	Delinquency First Reported	Feb 2023
Activity Designator		Creditor Classification	FINANCIAL
Deferred Payment Start Date		Charge Off Amount	
Balloon Payment Date		Balloon Payment Amount	
Loan Type	Debt Buyer Account	Date Closed	
Date of First Delinquency	May 2022		

Comments

Consumer disputes this account information
Collection account

Contact

LVNV FUNDING LLC
55 BEATTIE PLACE
GREENVILLE, SC 29601
1-866-464-1183

EXHIBIT E

Personal Credit Report for:
CAROLINE NYAMU

File Number:
394636801

Date Created:
03/29/2024

Visit transunion.com/dispute to start a dispute online.

Personal Information

You have been on our files since 12/23/2009. Your SSN has been masked for your protection.

Credit Report Date

03/29/2024

Social Security Number

XXX-XX-1031

Date of Birth

12/03/1987

Name

CAROLINE W. NYAMU

Also Known As

AKA

CAROLINE WANGECI NYAMU

Addresses

Current Address

2080 LAFONTAINE AVE APT 6K BRONX, NY 10457-3320

Date Reported

05/09/2018

June 2023	July 2023	August 2023	September 2023	October 2023	November 2023
Balance \$401	Balance \$493	Balance \$506	Balance \$452	Balance \$468	Balance \$444
Past Due \$0	Past Due \$50	Past Due \$60	Past Due \$0	Past Due \$50	Past Due \$45
Amount Paid \$25	Amount Paid \$0	Amount Paid \$14	Amount Paid \$60	Amount Paid \$0	Amount Paid \$29
Scheduled Payment \$25	Scheduled Payment \$25	Scheduled Payment \$25	Scheduled Payment \$25	Scheduled Payment \$25	Scheduled Payment \$25
Remarks ---	Remarks ---	Remarks ---	Remarks CBG	Remarks CBG	Remarks CBG
Rating OK	Rating 30	Rating 60	Rating OK	Rating 30	Rating 30

December 2023	January 2024	February 2024	March 2024
Balance \$450	Balance ---	Balance ---	Balance \$0
Past Due \$70	Past Due ---	Past Due ---	Past Due \$0
Amount Paid \$0	Amount Paid ---	Amount Paid ---	Amount Paid \$0
Scheduled Payment \$25	Scheduled Payment ---	Scheduled Payment ---	Scheduled Payment ---
Remarks CBG	Remarks ---	Remarks ---	Remarks CLO
Rating 60	Rating OK	Rating OK	Rating 60

Total Month

LVNV FUNDING LLC 37936402019****

Account Information**Address**C/O RESURGENT CAPITAL SERVICES, PO BOX 1269
GREENVILLE, SC 29603

Phone	(877) 527-4484
Date Opened	12/16/2022
Responsibility	Individual Account
Account Type	Open Account
Loan Type	FACTORING COMPANY ACCOUNT
Balance	\$1,003
Date Updated	03/05/2024
High Balance	\$1,003
Original Creditor	CREDIT ONE BANK N A
Past Due	\$1,003
Pay Status	>Collection<
Estimated month and year this item will be removed	04/2029

Remarks	Account information disputed by consumer (FCRA); >PLACED FOR COLLECTION<
---------	---

MIDLAND CREDIT MANAGEMENT INC 32369****

Account Information

Address	320 EAST BIG BEAVER,SUITE 300 TROY, MI 48083
Phone	(877) 822-0381
Date Opened	08/25/2023
Responsibility	Individual Account
Account Type	Open Account
Loan Type	FACTORING COMPANY ACCOUNT
Balance	\$1,144

Date Updated

03/23/2024

High Balance

\$1,144

Original Creditor

COMENITY CAPITAL BANK

Past Due

\$1,144

Pay Status

>Collection<

Estimated month and year this item will be removed

01/2030

Remarks

>PLACED FOR COLLECTION<

PORTFOLIO RECOVERY 604419104399****

Account Information

Address	120 CORPORATE BLVD,SUITE 100 NORFOLK, VA 23502
Phone	(844) 675-3407
Date Opened	09/17/2022
Responsibility	Individual Account
Account Type	Open Account
Loan Type	FACTORING COMPANY ACCOUNT
Balance	\$1,385
Date Updated	03/13/2024
High Balance	\$1,385
Original Creditor	SYNCHRONY BANK
Past Due	\$1,385
Pay Status	>Collection<
Estimated month and year this item will be removed	01/2029
Remarks	>PLACED FOR COLLECTION<

PORTFOLIO RECOVERY 524366167908****

Account Information

Address	120 CORPORATE BLVD,SUITE 100 NORFOLK, VA 23502
Phone	(844) 675-3407
Date Opened	08/20/2022
Responsibility	Individual Account
Account Type	Open Account

FACTORING COMPANY ACCOUNT

Balance	\$1,240
Date Updated	03/09/2024
High Balance	\$1,240
Original Creditor	SYNCHRONY BANK
Past Due	\$1,240
Pay Status	>Collection<
Estimated month and year this item will be removed	12/2028
Remarks	>PLACED FOR COLLECTION<

Satisfactory Accounts

The following accounts are reported with no adverse information. For your protection, your account numbers have been partially masked, and in some cases scrambled. Please note: Accounts are reported as "Current; Paid or paying as agreed" if paid within 30 days of the due date. Accounts reported as Current may still incur late fees or interest charges if not paid on or before the due date.

Account Name

BRIGHT CAPITAL 3317DF70B7C3420B9E0605****

Account Information

Address	50 CALIFORNIA ST,FLR 15 SAN FRANCISCO, CA 94111
Phone	(856) 832-6419
Monthly Payment	\$2
Date Opened	09/05/2023
Responsibility	Individual Account
Account Type	Line of Credit Account
Loan Type	CREDIT LINE SECURED
Balance	\$5

EXHIBIT F

PO Box 15077
Wilmington, DE 19850-5077



40063 AAC 000 001 29223 NNNNNNNNNNNN CA131

CAROLINE W NYAMU
2080 LAFONTAINE AVE
6K
THE BRONX NY 10457

October 18, 2023

Dear Caroline W Nyamu:

Thank you for applying for a new CHASE FREEDOM Visa Platinum account. We reviewed your application, and we're unable to approve this account for you at this time. We know this isn't the answer you were hoping for, and we'd like to give you more information about our decision.

We based our decision on the following reason(s)

- Serious delinquency, public record, or collection item
- Time since delinquency is too recent or unknown
- Number of accounts with delinquency
- Too few accounts currently paid as agreed

Details about the credit bureau and credit score we used to make this decision are included at the end of this letter. This information can help to build awareness around credit health, which is an important part of being approved for a future application.

We have a free tool that can help

Chase Credit JourneySM is our credit education resource where you can:

- Explore personalized resources to help you build and maintain your credit.
- See your latest credit score for free anytime, without affecting your credit.
- Gain insights into your credit health and how certain factors affect your score.
- Receive alerts to help protect your credit and identity.

You don't have to be a Chase customer to get started. You can enroll in Credit Journey at chase.com/CreditJourney or by scanning the QR code.



We appreciate your interest.

Sincerely,

Chase Card Services

Reference Number: 231018580597

Please see the end of this letter for important information

We used information from your credit report

Our credit decision was based in whole or in part on information obtained in a report from the consumer reporting agency listed below. You have a right under the Fair Credit Reporting Act to know the information contained in your credit file at the consumer reporting agency. The reporting agency played no part in our decision and is unable to supply specific reasons why we have denied credit to you.

EXPERIAN
PO BOX 2002
ALLEN, TX 75013-0036
(888) 397-3742
[HTTP://WWW.EXPERIAN.COM/REPORTACCESS](http://WWW.EXPERIAN.COM/REPORTACCESS)

We also used your credit score.

Your credit score is a number that reflects information in your credit report, such as whether you pay your bills on time and how much you owe creditors. When this information changes, your credit score also changes.

Scoring system name:	FICO® Score
Source:	Experian
Date calculated:	10/18/2023
Your credit score:	495

Scores calculated using this source can range from a low of 250 to a high of 900 (higher scores are better).

Here are the key factors that adversely affected your credit score

- Serious delinquency, public record, or collection item
- Time since delinquency is too recent or unknown
- Number of accounts with delinquency
- Too few accounts currently paid as agreed

FAIR CREDIT REPORTING ACT NOTICE

Under the Fair Credit Reporting Act, you also have a right to a free copy of your report from the reporting agency, if you request it no later than 60 days after you receive this notice. In addition, if you find that any information contained in the report you receive is inaccurate or incomplete, you have the right to dispute the matter with the reporting agency.

EQUAL CREDIT OPPORTUNITY ACT NOTICE

The federal Equal Credit Opportunity Act prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age (provided the applicant has the capacity to enter into a binding contract); because all or part of the applicant's income derives from any public assistance program; or because the applicant has in good faith exercised any right under the Consumer Credit Protection Act. The federal agency that administers compliance with this law concerning this creditor is the Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20006.

EXHIBIT G



P.O. Box 31290
Salt Lake City, UT 84131-0290

February 08, 2024

Caroline Nyamu
2080 Lafontaine Ave
Apt 6K
Bronx, NY 10457

Application ID: 20000007807238
Creditor: Capital One N.A.

Dear Caroline Nyamu,

Thank you for applying for a credit card issued by Capital One®. Unfortunately, after reviewing your application and information obtained from your consumer credit report(s) from the consumer reporting agencies detailed on the back of this letter - we cannot approve your request at this time.

The reason(s) for our decision are:

- Based on your application information, there is no checking account
- Based on your credit report from one or more of the agencies on the back of this letter, there are too many missed minimum payments on credit cards in recent history
- Based on your credit report from one or more of the agencies on the back of this letter, balance owed on delinquent past or present revolving credit obligation(s) is too high
- Based on your credit report from one or more of the agencies on the back of this letter, delinquent past or present credit obligation(s)

If you feel we missed something or misread your information, then please write to us at P.O. Box 31290 Salt Lake City, UT 84131-0290 and include your Application ID number referenced above. (Please note: we recommend you contact the consumer reporting agencies first to ensure they have accurately reported your information to us. Contact information for the consumer reporting agencies is provided on the back of this letter.)

We know this isn't the answer you were hoping for, but we hope there is an opportunity to provide you new products and services in the future.

Sincerely,

Capital One Customer Care Team

SEE REVERSE FOR ADDITIONAL IMPORTANT INFORMATION AND DISCLOSURES.

EXHIBIT H

AFFIDAVIT OF FACT


I, BOBBY L. HUGHLEY JR, being duly sworn, do depose and say that I am above the age of majority, and I have firsthand knowledge of the facts contained herein:

1. I currently reside at 148 W 130th St NEW YORK, NY 10027.
2. Caroline Nyamu is a very close friend of mine and we lookout for each other.
3. Caroline Nyamu told me she was troubled by LVNV Funding, LLC and Portfolio Recovery Associates reporting derogatory remarks to her consumer credit report.
4. Caroline Nyamu and I reviewed what would be the best options for her and she authorized me to write and mail a written correspondence according to 15 USC § 1692c(c).
5. Caroline Nyamu explained to me how the situation was making her feel and she became very emotionally connected to the situation. All she talked about was her consumer report and how she was constantly having anxiety about it led to her feeling physically ill, especially when the debt collectors kept reporting after receiving the written correspondence and when she was denied credit.
6. I personally witnessed Caroline Nyamu having panic attacks and suffering from tremors while stressing over the situation. I have had to console her and be a friend that she can lean on.
7. Caroline Nyamu talked with me and started to realize that the only course of action was to start litigation against LVNV Funding, LLC, and Portfolio Recovery Associates. She and I worked together to fill out the paperwork and compile all of the evidence to show the court the wrongs that were committed by

LVNV Funding, LLC, and Portfolio Recovery Associates and the damages inflicted upon Caroline Nyamu.

8. I have personally been Caroline Nyamu's Credit Repair Organization in this matter since the very beginning and I have volunteered to help my friend get through this.

Under penalty of perjury, I hereby declare and affirm that the above-mentioned statement is, to the best of my knowledge, true and correct.

Witness Signature:  Date: 3/29/24

NOTARY ACKNOWLEDGEMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, and not the truthfulness, accuracy, or validity of that document.

State of New York

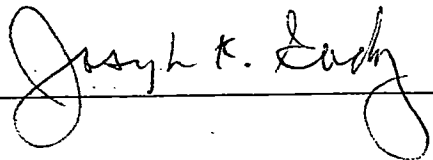
County of New York

On MARCH 29, 2024, before me, **BOBBY L. HUGHLEY JR.**, personally appeared who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under the PENALTY OF PERJURY under the laws of the State of NEW YORK that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature



JOSEPH K. EADY
Commissioner of Deeds
City of New York No. 3-3593
Certificate Filed in Bronx County
Commission Expires Nov. 1, 2024

EXHIBIT I

AFFIDAVIT OF FACT

I, CAROLINE NYAMU, being duly sworn, do depose and say that I am above the age of majority, and I have firsthand knowledge of the facts contained herein:

1. I currently reside at 2080 LAFONTAINE AVE APT 6K BRONX, NY 10457.
2. I have suffered tremendous emotional distress because of LVNV Funding, LLC, and Portfolio Recovery Associates.
3. I was troubled by LVNV Funding, LLC and Portfolio Recovery Associates reporting derogatory remarks to my consumer credit report after receiving my written notice.
4. I was denied credit on two separate occasions from Chase Bank and Capital One.
5. While dealing with this situation I have experienced injuries by suffering emotional distress leading to physical manifestations of chest tightness, brief periods of hyperventilation, migraines from thinking about the situation, tremors, accelerated heartbeat, vertigo, loss of appetite, loss of sleep, embarrassment from having to tell others and seek help to resolve the current financial situation, depression, and being denied credit.
6. I was embarrassed when I had to tell Bobby L Hughley, my friend, and Credit Repair Organization, about being denied credit on two separate occasions.

Under penalty of perjury, I hereby declare and affirm that the above-mentioned statement is, to the best of my knowledge, true and correct.

Witness Signature: Caroline Nyamu Date: 3/29/24

NOTARY ACKNOWLEDGEMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, and not the truthfulness, accuracy, or validity of that document.

State of NEW YORK

County of NEW YORK

On MARCH 29, 2024, before me, CAROLINE NYAMU, personally appeared who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under the PENALTY OF PERJURY under the laws of the State of NEW YORK that the foregoing paragraph is true and correct.

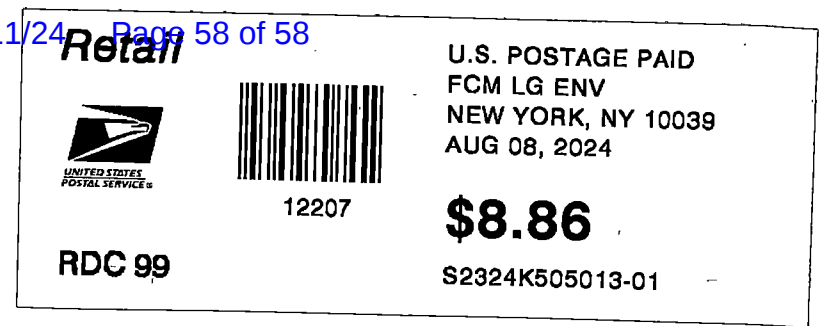
WITNESS my hand and official seal.

Signature

Joseph K. Eady

JOSEPH K. EADY
Commissioner of Deeds
City of New York No. 3-3593
Certificate Filed in Bronx County
Commission Expires Nov. 1, 2024

Caroline Nyamu
2086 Lafontaine Ave
Apt 6k
Bronx, NY 10457



Portfolio Recovery Associates
C/O Corporation Service Company
80 State Street
Albany, NY 12207

